

Exhibit A

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In Re: New York City Policing
During Summer 2020 Demonstrations

20-cv-8924 (CM)(GWG)

This filing is related to:

ALL CASES

NOTICE OF DEPOSITIONS

PLEASE TAKE NOTICE that, pursuant to Rule 30 of the Federal Rules of Civil Procedure, Plaintiffs in the above-captioned cases will take the deposition upon oral examination of the following parties, commencing at the time and on the date indicated, and continuing from day to day thereafter, or upon such adjourned date as may be agreed upon, until concluded. These depositions shall take place before a notary public or other officer authorized by law to administer oaths at the Office of the New York State Attorney General, located at 28 Liberty Street, 16th Floor, New York, New York, or at another location to be determined by Plaintiff, or by remote means (via videoconference) pursuant to Rule 30(b)(4) of the Federal Rules of Civil Procedure. Pursuant to Rule 30(b)(3)(A) of the Federal Rules of Civil Procedure, the deposition will be recorded by court reporter and/or audiovisual means.

PLEASE TAKE FURTHER NOTICE that, pursuant to Rule 34 of the Federal Rules of Civil Procedure, Defendants are required to produce, by electronic delivery, in advance of any deposition, any and all materials in any form they may have related in any way to the subject matter of the deposition and/or deponent.

You are invited to attend and cross-examine.

<i>Deponent</i>	<i>Date</i>	<i>Time</i>	<i>Deposing Party</i>
Police Officer Ismael Hernandez Carpio	June 22, 2021	9:30 am	<i>Wood</i>
Police Officer Alfredo Jeff	June 22, 2021	1:30 pm	<i>Sierra</i>
Sgt. Michael Cozier	June 23, 2021	9:30 am	<i>People</i>
Police Officer Debora Matias	June 23, 2021	1:30 pm	<i>Sierra</i>
Sgt. Majer Saleh	June 24, 2021	1:30 pm	<i>People</i>
First Name Unknown Mansharamani, Shield No. 941065	June 25, 2021	9:30 am	<i>Sow</i>
Police Officer Ray Soriano Shield No. 956275	June 25, 2021	1:30 pm	<i>Sow</i>
Sgt. Patrick Quigley	June 28, 2021	9:30 am	<i>People</i>
Police Officer Andre Jeanpierre	June 28, 2021	1:30 pm	<i>Sierra</i>
Police Officer Kevin Agro. Shield No. 8054	June 29, 2021	9:30 am	<i>Sow</i>
Police Officer Katarina Pjetri Shield No. 19806.	June 29, 2021	1:30 pm	<i>Sow</i>
Police Officer Enmanuel Montesino Shield No. 954146.	June 30, 2021	1:30 pm	<i>Sow</i>
Dep. Inspector Craig Edelman	July 2, 2021	9:30 am	<i>People</i>
Julio Delgado – Commanding Officer, SRG 2	July 8, 2021	9:30 am	<i>People, Sierra</i>
Det. Damian Rivera	July 9, 2021	9:30 am	<i>Payne</i>
Matthew Tarangelo	July 9, 2021	1:30 pm	<i>Payne</i>
Incident Commander – January 18, 2021 (Protest No. 83, Barclays Center Brooklyn to City Hall Park Manhattan)	July 12, 2021	9:30 am	<i>People</i>
Incident Commander – November 4, 2020 (Protest No. 77, Washington Square Park)	July 13, 2021	9:30 am	<i>People</i>
The NYPD Member of the Service wearing Helmet # 173 in Mott Haven on June 4, 2020	July 13, 2021	1:30 pm	<i>Wood</i>
Incident Commander – Nov. 4, 2020 (Protest No. 7, Central Park to Washington Square)	July 14, 2021	9:30 am	<i>People</i>
Lt. Michael Butler	July 14, 2021	1:30 pm	<i>Payne</i>
Incident Commander – Sep. 26, 2020 (Washington Square Park)	July 15, 2021	9:30 am	<i>People</i>
Police Officer Thomas Mosher	July 15, 2021	1:30 pm	<i>Wood</i>
Captain Vitaliy Zelikov	July 19, 2021	9:30 am	<i>People</i>

Police Officer Umid Karimov	July 19, 2021	1:30 pm	<i>Sierra</i>
Hensley Caraballo	July 20, 2021	9:30 am	<i>Payne</i>
Sgt. Gypsy Pichardo	July 22, 2021	9:30 am	<i>Payne</i>
Sgt. Keith Cheng	July 22, 2021	1:30 pm	<i>Payne</i>
Police Officer Ryan Brady Shield No.964402	July 27, 2021	9:30 am	<i>Sow</i>
Police Officer R. Gonzalez Shield No. 957635	July 27, 2021	1:30 pm	<i>Sow</i>
Jacqueline Vargas	July 29, 2021	9:30 am	<i>Payne</i>
The NYPD Member of the Service wearing Helmet 21286 near Church and Canal Streets on May 31, 2020	August 9, 2021	9:30 a.m.	<i>Yates</i>
The NYPD Member of the Service wearing Helmet 3138 near Church and Canal Streets on May 31, 2020	August 9, 2021	1:30 pm	<i>Yates</i>
The NYPD Member of the Service wearing Helmet 5662 near Church and Canal Streets on May 31, 2020	August 10, 2021	9:30 a.m.	<i>Yates</i>
The NYPD Member of the Service wearing Helmet 15519 near Church and Canal Streets on May 31, 2020	August 10, 2021	1:30 pm	<i>Yates</i>
Fausto Pichardo	August 11, 2021	9:30 a.m.	<i>Yates</i>

Dated: June 9, 2021
New York, New York

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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In Re: New York City Policing
During Summer 2020 Demonstrations

20-cv-8924 (CM)(GWG)

This filing is related to:

ALL CASES

NOTICE OF DEPOSITIONS

PLEASE TAKE NOTICE that, pursuant to Rule 30 of the Federal Rules of Civil Procedure and the Scheduling Order in this Matter (ECF No. 43), Plaintiffs in the above-captioned cases will take the deposition upon oral examination of the following individuals, commencing at the time and on the date indicated, and continuing from day to day thereafter, or upon such adjourned date as may be agreed upon, until concluded. These depositions shall take place before a notary public or other officer authorized by law to administer oaths at the Office of the New York State Attorney General, located at 28 Liberty Street, 16th Floor, New York, New York, or at another location to be determined by Plaintiffs, or by remote means (via videoconference) pursuant to Rule 30(b)(4) of the Federal Rules of Civil Procedure. Pursuant to Rule 30(b)(3)(A) of the Federal Rules of Civil Procedure, the deposition will be recorded by a court reporter and/or audiovisual means.

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You are invited to attend and cross-examine.

<i>Deponent</i>	<i>Date</i>	<i>Time</i>
Former Chief of Training Theresa Shortell	July 1, 2021	9:30 am
Chief of Intelligence Bureau Thomas Galati	July 6, 2021	9:30 a.m.
Chief of Training Kenneth E. Corey	July 7, 2021	9:30 am
Executive-in-Charge of Operations of Tactical Training Unit	July 13, 2021	9:30 am
Patrol Borough Commander (Manhattan South) Assistant Chief Stephen J. Hughes	July 16, 2021	9:30 a.m.
Legal Bureau Assistant Counsel Carrie Talansky	July 20, 2021	1:30 pm
Patrol Borough Manhattan North: Former Assistant Chief Kathleen M. O'Reilly (now Chief of Transit)	July 21, 2021	9:30 a.m.
Patrol Borough Bronx Assistant Chief Kenneth Lehr	July 23, 2021	9:30 a.m.
Patrol Borough Brooklyn South: Assistant Chief Brian Conroy	July 28, 2021	9:30 a.m.
Patrol Borough Brooklyn North: Former Assistant Chief Jeffrey Maddrey (now Chief of Community Affairs)	July 30, 2021	9:30 a.m.
Mayor Bill De Blasio	Aug. 3, 2021	9:30 am
Commissioner Dermot F. Shea	Aug. 4, 2021	9:30 am
Former Chief of Dept. Terence A. Monahan	Aug. 5, 2021	9:30 a.m.
Former Chief of Patrol Fausto Pichardo	Aug. 11, 2021	9:30 a.m.
Chief of Patrol, Juanita Holmes	Aug. 6, 2021	9:30 a.m.
Deputy Chief John D'Adamo, Commanding Officer Strategic Response Group	Aug. 12, 2021	9:30 a.m.
Inspector Gerard Dowling, Exec. Officer, Strategic Response Group	Aug. 17, 2021	9:30 a.m.
Commanding Officer David Miller, Disorder Control Unit	Aug. 18, 2021	9:30 a.m.
Deputy Chief Edward Mullane, Commanding Officer, Operations Division (Chief of Department's Office)	Aug. 19, 2021	9:30 a.m.
Deputy Commissioner Public Information Richard J. Esposito	Aug. 20, 2021	9:30 a.m.
Chief of Special Operations Harry J. Wedin	Aug. 24, 2021	9:30 a.m.
Deputy Commissioner for Counterterrorism and Intelligence John Miller	Aug. 25, 2021	9:30 a.m.
Deputy Commissioner, Internal Affairs Bureau – Joseph Reznick	Aug. 26, 2021	9:30 a.m.

NYPD Risk Management – Former Deputy Commissioner Jeffrey Schlanger	Aug. 27, 2021	9:30 a.m.
Current Chief of Department Rodney Harrison	Aug. 31, 2021	9:30 a.m.
Criminal Justice Bureau Chief (Commanding Officer) Donna Jones	Sept. 1, 2021	9:30 a.m.
Deputy Chief John Cappellmann, Office of Management Analysis and Planning	Sept. 2, 2021	9:30 a.m.
First Deputy Commissioner Benjamin Tucker	Sept. 3, 2021	9:30 a.m.

Dated: June 9, 2021
New York, New York

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